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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

ALICIA MADRIGAL,  
Plaintiff,

vs.

KILOLO KIJAKAZI, Acting  
Commissioner of Social Security,  
Defendant.

Case No. 1:21-cv-00790-AWI-BAM  
STIPULATION AND ORDER FOR  
SECOND EXTENSION OF TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 30-day extension of time, from March 22, 2022 to April 21, 2022, for Plaintiff to serve on defendant with PLAINTIFF'S OPENING BRIEF. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time Counsel for the Plaintiff has a pre-planned major orthopedic surgery the week of March 14, 2022. After the surgery, Counsel will be undergoing physical therapy and rehabilitation.

1 Additionally, another attorney with the firm, Ms. Dolly Trompeter, is currently out  
2 of state due to her father's medical condition and as a result, the undersigned has  
3 taken on additional matters compounding the need for an additional extension.

4 Due to the combination of the above issues, Counsel for Plaintiff  
5 respectfully requests a 30-day extension.

6 Counsel for the Plaintiff does not intend to further delay this matter.  
7 Defendant does not oppose the requested extension. Counsel apologizes to the  
8 Defendant and Court for any inconvenience this may cause.

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11 Respectfully submitted,

12  
13 Dated: March 9, 2022

PENA & BROMBERG, ATTORNEYS AT LAW

14  
15 By: /s/ Jonathan Omar Pena  
16 JONATHAN OMAR PENA  
17 Attorneys for Plaintiff  
18

19 Dated: March 9, 2022

PHILLIP A. TALBERT  
United States Attorney  
LISA A. THOMAS  
Regional Chief Counsel, Region VII  
Social Security Administration

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24 By: \*/s/ Jeffrey E. Staples  
25 Jeffrey E. Staples  
26 Special Assistant United States Attorney  
27 Attorneys for Defendant  
28 (\*As authorized by email on March 9, 2022)

**ORDER**

Based upon the stipulation of the parties, and for cause shown, IT IS HEREBY ORDERED, that Plaintiff shall have an extension of time, to and include April 21, 2022, in which to file Plaintiff's Opening Brief; and that all other deadlines set forth in the Court's Scheduling Order (Doc. 5) shall be extended accordingly.

IT IS SO ORDERED.

Dated: March 10, 2022

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE